

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

WICKFIRE, LLC,

Plaintiff,

v.

TRIMAX MEDIA, INC., *et al.*,

Defendants.

NO. 2:15-mc-00051-RSL

**DECLARATION OF SARA BROWN
IN SUPPORT OF RESPONSE IN
OPPOSITION TO MOTION TO
QUASH OR MODIFY SUBPOENA**

Related Case: U.S. District Court for the
Western District of Texas, Austin Division,
Case No. 1:14-CV-34

Noted for Motion Docket
Friday, May 22, 2015

Sara A. Brown states:

1. My name is Sara A. Brown. I am of sound mind, over the age of twenty-one years, have never been convicted of a felony or other crime involving moral turpitude, and I am capable of making this declaration. Unless otherwise stated, I have personal knowledge of the matters set forth herein, they are true and correct, and I could testify competently thereto if called upon to do so.

2. I am an attorney at Gardere Wynne Sewell, LLP ("**Gardere**"). I serve as counsel for TriMax Media, LLC ("**TriMax**") in the above-captioned action.

DECLARATION OF SARA A. BROWN - 1

GARVEY SCHUBERT BARER
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS
eighteenth floor
1191 second avenue
seattle, washington 98101-2939
206 464 3939

1 3. I certify that Exhibit 1 attached to TriMax's Response in Opposition to Motion to Quash
2 or Modify Subpoena is a true and correct copy of the April 22, 2015 email sent from David
3 Naffziger to Laura Woodruff.

4 4. I certify that Exhibit 2 attached to TriMax's Response in Opposition to Motion to Quash
5 or Modify Subpoena is a true and correct copy of the May 2, 2014 email sent from Jon Brown
6 to David Naffziger.

7 5. I certify that Exhibit 3 attached to TriMax's Response in Opposition to Motion to Quash
8 or Modify Subpoena is a true and correct copy of the December 19, 2013 email sent from
9 BrandVerity to Wickfire.

10 6. I certify that Exhibit 4 attached to TriMax's Response in Opposition to Motion to Quash
11 or Modify Subpoena is a true and correct copy of the April 7, 2015 subpoena served on
12 BrandVerity by TriMax.

13 7. I certify that Exhibit 5 attached to TriMax's Response in Opposition to Motion to Quash
14 or Modify Subpoena is a true and correct copy of the April 29, 2015 email from Barry Golden
15 to David Naffziger.

16 8. I certify that Exhibit 6 attached to TriMax's Response in Opposition to Motion to Quash
17 or Modify Subpoena is a true and correct copy of the May 1, 2015 email from Barry Golden to
18 David Naffziger.

19 9. I certify that Exhibit 7 attached to TriMax's Response in Opposition to Motion to Quash
20 or Modify Subpoena is a true and correct copy of the May 4, 2015 letter from Alan Middleton
21 to Peter Vogel, Barry Golden, and me.

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DECLARATION OF SARA A. BROWN - 2

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206 464 3939

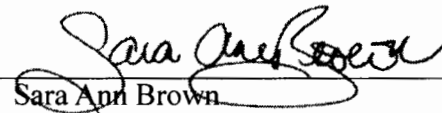
1 10. I certify that Exhibit 9 attached to TriMax's Response in Opposition to Motion to Quash
2 or Modify Subpoena is a true and correct copy of the May 1, 2015 email from David Naffziger
3 to Barry Golden.

4 11. I certify that Exhibit 10 attached to TriMax's Response in Opposition to Motion to
5 Quash or Modify Subpoena is a true and correct screenshot taken from the website of
6 BrandVerity, Inc. on May 20, 2015.
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8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
9 United States of America that the foregoing is true and correct.

10 Executed on May 20, 2015.
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12 Respectfully Submitted,

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14 Sara Ann Brown
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CERTIFICATE OF SERVICE

I, Jill M. Beagle, certify that on May 20, 2015, I caused a copy of the foregoing to be served upon the following by the means indicated.

Alan S. Middleton PLLC

By Email

Alan Middleton
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coburn@dclegal.com
wilson@dclegal.com

Dated this 20th day of May 2015.

GARVEY SCHUBERT BARER

/s/ Jill M. Beagle

Jill M. Beagle
Legal Assistant

GSB:7090684.2 [99991.41780]